



Oregon

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EIS001215

January 31, 2000

FEB 08 2000

Ms. Wendy R. Dixon, EIS Program Manager
U.S. Department of Energy
Office of Civilian Radioactive Waste Management
Yucca Mountain Site Characterization Office
PO Box 30307, M/S 010
North Las Vegas, NV 89036-0307

Dear Ms. Dixon:

Thank you for the opportunity to review the Yucca Mountain Draft Environmental Impact Statement (EIS). The following comments are submitted on behalf of the State of Oregon.

The Hanford Site is located just 30 miles from the Oregon border. The Columbia River flows through the Hanford Site before forming Oregon's northern boundary. The major transportation routes to and from Hanford pass through the State of Oregon. Therefore, decisions that impact waste at Hanford have a profound impact on the State of Oregon and its residents.

We concur with the comments submitted by our colleagues from the Washington Department of Ecology on behalf of the State of Washington, and offer additional comments on each.

1

- The draft EIS does not adequately address the potential impacts of various forms of "no action" on Hanford. Substantial quantities of high-level waste and spent fuel would remain in storage at Hanford. The impact of this indefinite long-term storage must be considered.
- The EIS states that different and less conservative parameters were used in evaluating the No Action Alternative as compared to those used for the repository analysis so as not to unduly influence the results in favor of the repository. As a result, the standards of the analysis become a comparison of apples and oranges. It is abundantly clear from the current extensive contamination of soils and groundwater at Hanford that these wastes are mobile and they will spread in the surface and near-surface environment. There are also additional unique driving forces including burrowing animals, insects and plants that increase these problems. The No Action Alternative analysis must be conducted with equal rigor and protection in its general assumptions for the comparison to have any real meaning.

2 ...

- The draft EIS is another part of a piecemeal and confusing decision making process. Other EIS's conducted by the U.S. Department of Energy (DOE) indicate Hanford's high-level waste will go to a national repository. The Yucca Mountain EIS does not support that



2 conclusion. DOE must reconcile these divergent decision-making documents and should
3 involve the states and tribes in this effort.

- 3 ■ The selection of wastes to send to the High Level Waste repository creates orphan wastes. This has serious repercussions. One such example is the spent nuclear fuel stored at Hanford. If some small part of this material is left at Hanford, nearly the full costs of continuing to operate the storage facilities for these wastes will continue for the indefinite future. It makes more sense to include all of the spent nuclear fuel from Hanford as a single unit for disposal. On the other hand, if the waste is not sent for disposal, it has no other path forward and additional work will be needed in the next 50 years to remove the fuel from storage and process it into a form that can either be safely maintained for the long term, or disposed elsewhere. It is not safe for storage in its currently planned form for more than about 50 years. Questions also remain unanswered about the ultimate status of "Greater than Class C" and "Special Case" wastes and other spent fuel waste forms, such as spent fuel from the Fast Flux Test Facility currently stored at Hanford.

4 In addition to the serious discrepancies with the No Action Alternative noted by Washington, another major problem involves the potential failure and release mechanisms if the waste is processed into glass intended for repository disposal and which is instead left in near surface storage. The alloys planned for the containers may not be suitable for long term surface or near surface storage. The glass waste form is likewise not designed to withstand the corrosive effects of surface waters containing erosive organic vegetative decay products such as humic and fulvic acids. These materials corrode glass far more rapidly than their low acidity would indicate. They do not exist in waters that would be encountered in a repository setting, but they are always present in surface waters.

Oregon Office of Energy staff currently co-chair the Western Interstate Energy Board's (WIEB) High-Level Radioactive Waste Committee. As such, we participated in the preparation of WIEB's comments on the Yucca Mountain Draft EIS. We concur as well with the points expressed in comments presented by Captain Alan Turner of the Colorado State Patrol on November 16, 1999:

- 5 ■ DOE needs to conduct route-specific analysis for NWPA shipments
- 6 ■ DOE needs to designate spent nuclear fuel/high-level waste shipment corridors to allow states and tribes to properly focus training and emergency response resources
- 7 ■ DOE needs to analyze and select the transportation mode for NWPA shipments

Oregon has worked closely with both DOE Headquarters and DOE's Richland Operations Office

- 8 on a variety of transportation issues. Even though DOE has stated it has not yet determined specific routes, in some parts of the country the choices are few and the most likely route is obvious. From Hanford, the most likely transportation route for high-level waste and spent fuel would be to travel through about 200 miles of northeastern Oregon. For road transport, Interstate 84 through eastern Oregon often experiences severe winter weather conditions which make travel particularly treacherous. Spring and fall are also subject to unexpected dust storms – one of which this past fall resulted in a series of crashes which killed six people and injured more than 20. The rail corridor has equally difficult rail conditions combined with narrow canyons making response and recovery operations very difficult.

The draft EIS lacks any detailed consideration of the problems associated with conditions such as these on specific routes. These shortcomings need to be addressed in detail and reasonable alternatives need to be considered.

We look forward to working with you to resolve these issues and for detailed planning and accident preparedness involved in transport. If you would like to discuss this with me or if have questions please contact me at (503) 378-5544 or Ken Niles on my staff at (503) 378-4906.

Sincerely,



Mary Lou Blazek, Administrator
Nuclear Safety Division

Cc: Felix Miera, U.S. Department of Energy, Richland Field Office
Doug Sherwood, U.S. Environmental Protection Agency
Mike Wilson, Washington Department of Ecology
Armand Minthorne, Confederated Tribes of the Umatilla Indian Reservation